

## STATEMENT CONCERNING OPERATING PROCEDURES

Action Communications, Inc., (Carrier) has established procedures for its operations which ensure compliance with the rules of the Federal Communications Commission which govern the protection of customer proprietary network information (CPNI).

Carrier employs a system by means of which Carrier can establish the status of each customer's CPNI approval before Carrier uses that CPNI. Carrier trains its employees in the authorized use of CPNI and has established procedures for the disciplining of any employee which does not adhere to Carrier's CPNI safeguard procedures.

Carrier retains a record of the sales and marketing campaigns of itself and its affiliates which use the CPNI of its customers. Carrier retains a record of each instance in which CPNI was disclosed or provided to third parties, or where third parties were provided with access to CPNI. Carrier's records include a description of each sales or marketing campaign, the specific CPNI which was used in the campaign, the date and purpose of the campaign, and the products or services that were offered as part of the campaign.

Carrier has established a supervisory review process regarding compliance with the Commission's CPNI rules for outbound marketing situations and Carrier maintains a record of Carrier's compliance for a minimum of one year. Sales personnel are required to obtain supervisory approval of any proposed outbound marketing request.